Requirements to Obtain a Special Local Need (SLN) Pesticide Registration in the State of Oregon.

INTRODUCTION

The Oregon Department of Agriculture (ODA), as defined in 40 CFR 162.151(j), is the designated lead agency responsible for registering pesticides to meet special local needs under section 24(c) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as Amended.

A special local need (SLN) is defined as, "an existing or imminent pest problem within a State for which the State lead agency, based upon satisfactory supporting information has determined that an appropriate federally registered pesticide is not sufficiently available", 40 CFR 162.151(i).

Registrants are strongly discouraged from attempting to use the registration process granted under FIFRA Section 24c as a marketing tool, or as a method of circumventing EPA requirements, fees or time constraints. These types of registrations will only be granted if Oregon growers have a legitimate need for the product.

Under FIFRA section 24(c), each State is authorized to register a new end use product for any use, or an additional use of a federally registered pesticide product, if the following conditions exist, 40 CFR 162.152 (a):

- (1) There is a special local need for the use within the State;
- (2) The use is covered by necessary tolerances, exemptions or other clearances under the Federal Food, Drug and Cosmetic Act (21 U.S.C. 346 et seq.), if the use is a food or feed use;
- (3) Registration for the same use has not previously been denied, disapproved, suspended or cancelled by the Administrator, or voluntarily cancelled by the registrant subsequent to issuance by the Administrator of a notice of intent to cancel that registration, because of health or environmental concerns about an ingredient contained in the pesticide product, unless such denial, disapproval, suspension or cancellation has been superseded by subsequent action of the Administrator; and
- (4) The registration is in accord with the purposes of FIFRA.

Over 200 crops are grown Oregon. Many of these crops are small acreage, minor specialty crops. SLN registrations have been particularly useful to growers of minor crops, who often have limited access to pest management options, including pesticides. Types of SLN registration requests considered include: the addition of a crop or site;

incorporation of an alternate application method, such as chemigation or dip (for bulbs etc.); change in the timing of application; encouragement of the use of reduced risk pesticides or pesticides which facilitate resistance management; or the modification of the application rate.

Three specific criteria which need to be met before a SLN request will be considered in Oregon are:

- 1. There is no pesticide product registered by the EPA for such use.
- 2. There is no EPA- registered product which, under the conditions of use within the State, would be as safe and/or as efficacious for such use within the terms and conditions of EPA registration.
- 3. An appropriate EPA- registered pesticide product is not available.

When the State grants a SLN registration, the U.S. EPA is informed and provided with a letter of notification and a copy of the accepted label. However, if there are environmental, pesticide residue/tolerance, or worker safety concerns, the state may elect to consult with EPA in evaluating a SLN request. Once EPA receives notification from the State that a SLN has been granted, the State receives a letter acknowledging receipt of the State's action, but not a letter of acceptance from EPA.

After receiving notification from the State, EPA has 90 days in which to conduct a review of the SLN for required pertinent information. The EPA may request modifications of the label or conditions of registration from the State, request data, disapprove the registration or request for the state to withdraw the registration. After 90 days, a SLN which has not been disapproved is considered federally registered, but is authorized for distribution and use only within that State, 40 CFR 162.152 (c). EPA may disapprove the registration at any time if it is believed that the use constitutes an imminent hazard, or may result in excessive residue levels, 40 CFR 162.154 (b). However, usually the registrant and the State exercise the option to withdraw the registration, prior to EPA disapproving the registration.

Non-EPA Registered/New Products

In certain situations, a pesticide formulation or product may not yet be registered for sale in the U.S. for various reasons, including the product was recent formulated to satisfy specific local need requirements.

In other situations, the State, U.S. EPA or registrant may have environmental or other concerns, or have not completed the necessary studies. An example of this would be a pesticide not approved for use by the EPA in coastal states because of concerns associated with marine organisms. In an extreme need situations ONLY, a SLN registration may allow the State to incorporate protective language, conditions of use or restrictions which can be specifically tailored to the particular crop, and area of proposed use. However, SLNs are not available as a method to circumvent EPA mandated studies and data requirements.

All provision as stated in 40CFR162.152 must be met:

Sec. 162.152 State registration authority

- (b) Types of registrations
- (2) New products.
 - (i) Subject to the provisions of paragraph (a) and subparagraphs (b)(2) (ii) and (iii) of this section, a State may issue registrations to meet special local needs for the following types of new end-use products:
 - (A) A product which is identical in composition to a federally registered product, but which has differences in packaging, or in the identity of the formulator.
 - (B) A product which contains the same active and inert ingredients as a federally registered product, but in different percentages.
 - (C) Subject to the requirements of paragraph (b)(2)(ii) of this section, a product containing a new combination of active, or active and inert, ingredients.
 - (ii) A State may register a new product only if each of the active ingredients in the new product is present because of the use of one or more federally registered products and if each of the inert ingredients in the new product is contained in a federally registered product.
 - (iii) A State may not register a new manufacturing-use product.
 - (iv) A State may register any use of a new product containing an ingredient described in paragraph (a)(3) of this section, if the new product registration is for a formulation or a use not included in the denial, disapproval, suspension, or cancellation, or if the federally registered use was voluntarily cancelled without a prior notice of intent to cancel by the Administrator. However, a formulation or use of such a new product which was not considered by the Administrator during such proceedings, or which was not the subject of a notice of intent to cancel, may be registered by a State only after the State consults with appropriate EPA personnel regarding the registration application.

COMPONENTS OF A SLN REQUEST PACKAGE

Submit two copies of all the requested information, unless instructed otherwise. Please provide these copies as two distinct booklets. This allows the Department to readily forward a copy to an Oregon State University (OSU) expert, or other knowledgeable individual.

COVER LETTER AND SUPPORTING DOCUMENTATION

Submit a cover letter that discusses, in detail, the events which brought about the "special local need" request. The discussion must provide, (1) a description of the pest problem, (2) an indication whether the pest problem is nationwide or localized (indicate if the proposed use has been requested or granted in other states) and, (3) a list of the available pesticides (or active ingredients) currently registered for the use in question, and the reasons why they will not adequately control the pest problem and/or they are not sufficiently available. In addition, the questions below need to be answered:

- a. Will the pesticide be used near or in an environmentally sensitive area? If so, the registrant must justify the use of the pesticide, and indicate what precautionary measures have been implemented
- b. Is the product currently federally registered? If the answer is no, is the product identical in composition to a federally registered product or does it contain the same active ingredient(s) and inert ingredient(s), but in different percentages, as that of a federally registered product?
- c. Has the registration for the proposed use previously been denied, disapproved, suspended or canceled by the EPA? If the answer is yes, include a detailed discussion of the action taken by the EPA.
- d. Has the registration for the proposed use been voluntarily canceled? If the answer is yes, explain the reason(s) for the voluntary cancellation.
- e. Has the registration for other uses of the product previously been denied, disapproved, suspended or canceled by the EPA? If the answer is yes, provide a detailed discussion of the action.
- f. Is the product under special review at the EPA? If the answer is yes, provide a detailed discussion of the concern that triggered the special review and its current status.
- g. Is the pesticide currently undergoing reregistration? If so, is the proposed use being supported?

LETTERS OF SUPPORT

Submit letters of support for the SLN registration from the following:

- a. An OSU researcher, extension specialist or other unaffiliated expert who is capable of verifying the special local need, and has worked with (or is familiar with) the proposed use and the registered alternatives.
- b. An individual representing the commodity group, commission or association for the crop/site. In the absence of a commodity or user organization, individual letters of support from growers/applicators will suffice.

FEDERAL SLN APPLICATION

Submit a signed, partially completed and dated federal SLN application form (EPA form 8570-25 [Rev. 1-94]), except when the request is for a SLN registration under a supplemental distributor label. Submit the one triplicate form. Upon granting the SLN, ODA will complete the rest of the form, sign it, retain a copy for the ODA files, and send a copy to the registrant and to EPA.

ODA PESTICIDE REGISTRATION FORM AND FEES

An ODA Pesticide Registration Form may be obtained directly from the Department or downloaded from the ODA website, http://oregon.gov/ODA/PEST/docs/pdf/lt64.pdf. Please provide the information required on this form. ODA will assign the SLN number. In the past, no fee was required for a SLN registration if the associated Section 3 product was also registered by your company. However, beginning 2006 a registration fee for all SLNs was assessed.

APPLYING FOR A SLN REGISTRATION FOR A NON-FEDERALLY REGISTERED PRODUCT.

According to the U.S. EPA, Office of Pesticide Programs, Label Review Manual, Chapter 17, "Although most 24(c) registrations amend federally registered products with supplemental labels, the state may also register a new end-use product (not federally registered) as a 24(c) registration. The ingredients (including inerts) of the new end-use product must be contained in one or more federally registered Section 3 Products. (CFR 162.152 (b)(ii))." In the state of Oregon, if the active ingredient and/or inerts are not federally registered, and if certain criteria are met, the Section 18 process is possibly an option.

PROPOSED SLN LABEL

In addition to the information which usually appears on the SLN label (registrant and product's name, rate, restricted use designation statement (if applicable), crop/site etc., ODA has supplementary requirements. It has come to the attention of ODA that many pesticide applicators exclusively use the SLN label and do not refer back to the Section 3 label, as required by law. Consequently, these applicators are missing valuable safety and environmental information. In response, the Department implemented new SLN label format policy standards.

The following information is required to be placed on the label. In some situations, additional information will be required on the label. You will be notified during the label review what additional information is required.

- 1. Ingredients Statement
- 2. Indication if the product is a Restricted Use Pesticide
- 3. Signal Word
- 4. Environmental Hazards (entire statement)
- 5. **Pertinent** Directions for Use, including Agricultural Use Requirements (WPS)
- 6. **Pertinent** General Information

The SLN label must also state:

"This label and the federal label for this product must be in the possession of the user at the time of pesticide application".

"Follow all applicable directions, restrictions, and precautions on this Supplemental label and the main EPA-registered label. It is a violation of federal law to use this product in a manner inconsistent with its labeling."

The EPA SLN No. must appear on the front panel of the label, either beside or below the EPA Reg. No.

Surface Water Protection Statement

If a pesticide is classified as a "Restricted Use Pesticide" because of its toxicity to fish and/or aquatic organisms, and will be used in one or more counties where listed threatened or endangered aquatic species occur, the registrant may be required to include a "Surface Water Protection Statement" on the label. A NW Region Species List can be found at the NOAA Fisheries, National Marine Fisheries Service Web site, http://www.nwr.noaa.gov/

In certain cases, regardless of classification status, the statement below will be required: "Do not apply this product to fields when soil moisture is nearing, at, or exceeding field capacity, and/or when a rain event likely to produce runoff from the treated field is forecasted by NOAA/NWS (National Weather Service), and will occur with 48 hours."

In addition for certain active ingredients, the following statement may be required:

"Certain uses of [Name of Pesticide] may be restricted by a U.S. District Court final order. You may refer to the Oregon Department of Agriculture web site at http://oda.state.or.us/pesticide/lawsregs/buffers.html or to the U.S. EPA web site at http://www.epa.gov/espp/wtc/maps.htm#wtc6 for information regarding pesticides that may be impacted by the final order."

Chemigation

If the pesticide is subject to EPA PR Notice 87-1 regarding chemigation, then the SLN label must contain a statement either prohibiting or giving specific directions for use through irrigation equipment. If chemigation is to be prohibited, include the statement:

"Do not apply this product through any type of irrigation system."

If chemigation will be allowed, the SLN label must provide chemigation instructions and data supporting efficacy with this type of application.

Expiration Date

A three year expiration date is indicated on all revised, amended, transferred or issued SLN labels. For example, a SLN issued between January 1 and December 31, 2007 would contain the following statement:

"This label valid until December 31, 2011 or until otherwise amended, withdrawn, canceled, or suspended."

The purpose of the expiration date is to allow review of the SLN label after it has been in use to insure that precautions, PPE, and restrictions are still adequate, and to determine

if the SLN registration is still required (i.e. the use may have been added to the Section 3 label). Thirty (30) days prior to the expiration date the registrant should submit a revised label to ODA that extends the expiration date for another three years.

DATA

A SLN registration must be accompanied by supporting documentation. Submit two (2) copies of field data, published articles, written statements by qualified experts (see "Letters of Support" above) and other documents which support the request.

Residue data

According to Section 24 (c)(3) of FIFRA, "In no instance may a State issue a registration for a food or feed use unless there exists a tolerance or exemption under the Federal Food, Drug, and Cosmetic Act, that permits the residues of the pesticide on the food or the feed." Please cite the tolerance or exemption from tolerance and reference the specific Code of Federal Regulation (CFR) where the tolerance information can be found.

Describe the practice(s) involved in producing the crop. Is the crop marketed fresh? Processed? Both? What happens to the crop residue/by-products? Is any portion of it fed to livestock?

Data showing that the proposed use will not result in crop residues exceeding the established tolerances must be submitted if the proposal involves any of the following:

- a Increased application rate.
- b. Increased number of applications.
- c. Decreased interval between applications.
- d. Decreased pre-harvest interval.
- e. Change from soil application to foliar application.

The data should be generated under Good Laboratory Practices (GLP) as established under Part 160 CFR. A signed statement must accompany the data (1) indicating the study was performed under GLP, or (2) describing in detail all differences between the practices used in the study and those required under GLP with an explanation as to why this will not invalidate the data, or (3) indicating the requester did not conduct the study and does not know whether the study was conducted in accordance with GLP.

The residue data must be accompanied by the field and laboratory protocols and the procedures used to carry them out. If the data is also on file at the EPA, include the appropriate references (e.g. MRID number).

Efficacy data

The SLN registration request must be supported by efficacy data (comparative data when other registered pesticides are available for use) of the material used at different rates. Whenever possible, field trials should cover a minimum of two growing seasons and be performed in Oregon. Data generated in areas outside Oregon may be used if it can be shown that the conditions under which the trials were conducted were similar to conditions in the growing areas of Oregon. Efficacy data must be accompanied by the study protocol and the procedures used to carry it out. The rate and time of year the pesticide was applied, must correspond with the SLN request. For example in one recent request, all herbicide applications were made in the fall. Yet, the SLN label provided growers the option of a fall and/or spring application. In addition to no spring studies being submitted, no studies were submitted for multiply applications.

Phytotoxicity data

Discuss the potential for the proposed use to cause phytotoxicity to the crop and submit any applicable data. Horticultural growth data is often warranted, for perennial and some annual crops. An example, a potential registrant wants a SLN for the use of a herbicide and the site is defined as, "recently established non-bearing apple orchards". In this situation, the youngest trees are approximately one inch in diameter. All the studies submitted but one, were conduct on mature apple trees. Should the SLN be granted? No, for the protection of the growers, the State needs growth data to indicate if the herbicide causes stunting, or some other negative effect.

EFFECTS ON BENEFICIAL INSECTS OR USEFULNESS WITH IN AN IPM PROGRAM

Discuss any potential adverse or positive effects to beneficial and/or pollinating insects. Discuss if this is a reduced risk pesticide, how this product can be used to promote resistance management, or used within an IPM program. Discuss how to time applications based on the plant phenology, life cycle of the pest, or the results of pest monitoring data.

ADVERSE EFFECTS

As part of the Section 24(c) process, the Department is required to assess if the *Unreasonable adverse effects determination* provision as stated in 40 CFR 162.153 (c) is being met:

(1) Prior to issuing a registration in the following cases, the state shall determine that use of the product for which registration is sought will not cause unreasonable adverse effects on man or the environment, when used in accordance with labeling directions or widespread and commonly recognized practices.

Registrants must address the potential risk to human health, endangered or threatened species, beneficial organisms, groundwater and the environment. Areas which may need to be addressed include, but are not limited to:

- a. Proximity to aquatic systems.
- b. Proximity to endangered species habitats.
- c. Proximity to residences.
- d. Potential for off-target movement.
- e. Soil type considerations (i.e. potential to leach, potential for carryover, etc).
- f. Proposals to mitigate risk (i.e. protective clothing, setback restrictions, soil type restrictions, etc.).

ODA will review potential risks and proposals to mitigate risks. When appropriate, ODA will consult with other agencies (e.g. NOAA Fisheries, ODF&W, USFWS) to determine if proposed risk mitigation measures are adequate.

WAIVER OF LIABILITY STATEMENTS (This section is subject to <u>frequent change</u>)

Waiver of liability statements are used to limit product liability and are only applicable for crops grown on very limited acreage (e.g. some seed crops). ODA can provide examples to you from recently granted SLNs. EPA is opposed to enforcing limitations of user's rights, and will only allow certain waiver language. The following language is currently acceptable to EPA (subject to change):

"(Registrant's) Special Conditions and Disclaimer for use of (Product) on (Crop)"

"(Registrant) intends that this Section 24(c) label be distributed only by the (Grower Association) only to end users and/or growers who agree in writing to the terms and conditions required by the (Grower Association) including a waiver and release from all liability and indemnification by the user and/or grower of (Registrant), (Grower Association), and others for failure to perform and crop damage from the use of (Product) on (Crop). If such terms and conditions are unacceptable, return (Product) at once unopened."

"This product when used on (Crop) may lead to crop injury, loss, or damage. (Registrant) recommends that the user and/or grower test this product in order to determine its suitability for such intended use. The (Grower Association) and (Registrant) make this product available to the user and/or grower solely to the extent the benefit and utility, in the sole opinion of the user and/or grower, outweigh the extent of potential injury associated with the use of this product. The decision to use or not to use this (Pesticide) must be made by each individual (Product) user and/or grower on the

basis of possible crop injury from (Product), the severity of (Pest) infestation, the cost of alternative (Pest) controls, and other factors. (Registrant) intends that because of the risk of failure to perform or crop damage that all such use is at the user's and/or grower's risk."

CONFIDENTIAL STATEMENT OF FORMULA

In Oregon, a confidential statement of formula is only required if the product is not currently registered under Section 3.

SLN's FOR SUPPLEMENTAL DISTRIBUTOR PRODUCTS

Section 3(e) of FIFRA allows pesticide registrants to distribute or sell a registered pesticide product under a different name instead of or in addition to their own. Such distribution and sale is termed ``supplemental distribution" and the product is termed a ``distributor product." EPA requires the pesticide registrant to submit a supplemental statement (EPA Form 8570-5) when the registrant has entered into an agreement with a second company that will distribute the registrant's product under the second company's name and product name.

Supplemental distributor products have an EPA Registration No. formatted in a three-part series such as, XXX-XXX. EPA does not allow supplemental distributors of the Section 3 product (also called a sub-registrant) to be the SLN registrant.

If a distributor of a Section 3 product also wants to distribute a SLN label, a SLN registration must be issued to the registrant of the Section 3 product. A written letter of approval signed by the primary (Section 3) registrant agreeing to the supplemental distributor SLN label must be submitted to ODA, along with the supplemental distributor's SLN request.

If the SLN package proves satisfactory, the Department will issue a SLN registration to the primary registrant, and approve the labels of both the primary registrant and the distributor. The labels should essentially appear similar, and have the same SLN No. The distributor's SLN label should indicate on the back page(bottom) that the 24(c) registrant is [company name and address of primary registrant], and the distributor is, [company name and address of distributor]. The primary registrant needs to complete EPA form 8570-25 [Rev. 1-94].

The primary registrant's label and EPA form 8570-25 will be forwarded to EPA, and the distributor label will be forwarded at the same time to EPA as a matter of courtesy. When the primary registrant's SLN registration is canceled or withdrawn, the distributor' SLN label automatically becomes invalid.

SEED CROP ISSUES

CROPS GROWN FOR SEED

Since the 1990's Oregon has had an Oregon Administrative Rule regulating the use of pesticides on alfalfa grown for seed, OAR 603-057-0535. However, on January 1, 2002, this rule was expanded to include the crops listed below.

Alfalfa	Clover	Mizuna
Alliums (except garlic)	Collards	Mustard (including Chinese)
Arugula	Cucumber	Parsley
Beet (garden and sugar)	Dill	Parsnip
Birdsfoot Trefoil	Drug & Medicinal Crops	Radish (except daikon)
Broccoli (including Chinese)	Endive	Rapeseed (industrial oil only) 1
Brussels Sprouts	Escarole	Rutabaga
Burdock	Herbs (Culinary)	Spinach
Cabbage (including Chinese)	Herbs (Dietary Supplement)	Squash, Summer
Carrot	Kale (including Chinese)	Squash, Winter (except Pumpkin)
Cauliflower	Kohlrabi	Swiss Chard
Celery	Lettuce	Turnip
Cilantro/Coriander	Meadowfoam	Vetch

¹ Industrial oil rapeseed as defined in OAR 603-052-0860 (c)(d))

For the crops covered under OAR 603-057-0535, the following statement is required on the label:

"Special Crop Use Restrictions

The pesticide applicator, the producer of the crop, and the seed conditioner must be aware that use of this product according to this labeling is deemed a nonfeed/non-food use by the Oregon Department of Agriculture, and is regulated by Oregon Administrative Rule (OAR) 603-057-0535, Pesticide Use On Crops Grown For Seed. If the applicator of this pesticide is not the producer, the applicator should provide a copy of this labeling to the producer of the crop. Producers of this crop who use this product, or cause the product to be used on a field they operate, should provide a copy of this pesticide label to the seed conditioner.

This pesticide does not have an established pesticide residue tolerance for this crop. Consequently, no portion of this seed crop may be used or distributed for food or feed. This restriction pertains to, but is not limited to, green chop, hay, pellets, meal, whole seed, cracked seed, straw, roots, bulbs, foliage or seed screenings, and to the grazing of the crop field, stubble or regrowth. All seed screenings shall be disposed of in such a manner that the screenings cannot be distributed or used for food or feed purposes, as indicated in OAR 603-057-0535. Additional regulations concerning seed screenings are stated in OAR 603-057-0535.

Any seed from a field treated with this pesticide product shall bear specific and conspicuous container labeling, or if shipped in bulk, on the shipment invoice or bill of lading. The labeling shall contain the following statement:

This seed was produced using one or more products for which the United States Environmental Protection Agency has not established pesticide residue tolerances. This seed, in whole, as sprouts, or in any form, may not be used for human consumption or animal feed. Failure to comply with this condition may violate requirements of the Federal Food and Drug Administration, the Oregon Department of Agriculture and other regulatory agencies."

1. GRASS GROWN FOR SEED

According to EPA, grass grown for seed is a food crop. "EPA regulates 'grass grown for seed' as a subgroup of 'grass, pasture and rangeland', in the OPPTS Residue Chemistry Test Guidelines Series 860.1000 (pages 27 & 35). All pasture and rangeland grasses, including grass grown for seed, are considered food/feed uses. The raw agricultural commodities (RACs) of the crop "grass, pasture and rangeland" are grass forage and grass hay. Thus the RACs for grass grown for seed are:

- grass, forage
- grass, hay

_

Label language restricting the feeding of livestock feed items resulting in a non-food type use is not generally considered practical (except specified "establishment year uses"). Field trial residue data (including meat and milk) are required to establish tolerances on grass forage and hay as they are all food uses by EPA regulations. Tolerances are not required for the straw and seed screenings resulting from the production of the crop 'grass grown for seed'. Label restrictions prohibiting the feeding of seed screenings or straw to livestock are not considered practical. For a more complete description of this EPA policy, see the draft document titled "Additional Guidance on the Crop - Grasses Grown for Seed", dated 09/30/2000.

"ME-TOO" REGISTRATIONS

ODA does not grant one company a SLN request, simply because another company has an SLN. Each potential registrant must build their own SLN package. If data compensation is an issue, registrants should make formal arrangement with each other prior to the Department being contacted.

CHANGES TO EXISTING SLN REGISTRATIONS

AMENDING OR REVISING SLN REGISTRATIONS

In order to amend or revise an SLN label in any manner, registrants must first submit a request to the ODA. The request must include a detailed discussion of the label changes, 3 copies of the (proposed) revised label, and any necessary data or other documents to support the requested changes. Revised or amended labels may not be distributed until the registrant receives written notification indicating the changes have been accepted. Significantly revised SLNs may be assigned a new SLN number. ALL SLNs must meet ODA's current label format.

TRANSFERRING SLN REGISTRATIONS

When a registration is transferred from one company to a another company, it is considered a new registration, and will be assigned a new SLN number by ODA, and required to meet current ODA label format standards. The new proposed registrant must complete a federal SLN application form (EPA form 8570-25 [Rev. 1-94]). The original SLN no. associated with the original company may be canceled immediately by the original company, or may be canceled after the material has cleared the "channels of trade".

WITHDRAWING OR CANCELING EXISTING SLN REGISTRATIONS

ODA must receive a written request from the registrant to voluntarily withdraw or cancel an SLN registration. Simply crossing out the SLN number on the Pesticide Renewal Form is insufficient. ODA will notify EPA of the change in registration status, and often OSU Extension. For the benefit of growers, ODA provides a list of canceled SLNs in the quarterly Departmental newsletter. Because this cancellation may have an impact on grower/user groups, ODA requests a brief explanation of the reason(s) for cancellation.

CONTACT INFORMATION

Submit the completed SLN Registration request package to:

Special Local Need Registrations
Pesticides Division
Oregon Department of Agriculture
635 Capitol St. NE
Salem, OR 97301
(503) 986-4635 (phone), (503) 986-4735 (fax)